

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
BETWEEN DEBTORS, MOHAMMAD HONARKAR, AND 4G WIRELESS INC.**

The undersigned hereby certifies as follows:

1. On February 28, 2025 (the “Petition Date”), Debtors MOM Investco CA, LLC, MOM AS Investco, LLC and MOM BS Investco, LLC (collectively, the “MOM Investcos”) each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Delaware (the “Court”). On March 10, 2025, the remaining Debtors filed their petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, administrator or official committees have been appointed at this time in these chapter 11 cases.

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], and 837 Park Avenue, LLC [3229]. The Debtors’ headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

2. Prior to the Petition Date, in or around September 2023, certain of the Debtors initiated twenty-one unlawful detainer actions against tenants occupying various real properties owned by the Debtors without paying rent (collectively, the “Unlawful Detainer Actions”) in the Superior Court of California, Orange County, California (the “Superior Court”).

3. In twelve of the Unlawful Detainer Actions, the Superior Court issued orders, pursuant to California Code of Civil Procedure § 572, *et seq.*, requiring the tenant defendants to deposit the monthly rental payments with the Superior Court’s treasury, as provided in California Government Code § 68084 (each a “527 Order”).

4. The 527 Orders stayed the respective Unlawful Detainer Actions pending the final disposition of the matter entitled *MOM CA Investco LLC v. Honarkar*, Case No. 30-2023-01322886-CU-OR-CJC, filed before the Superior Court (the “Superior Court Litigation”).

5. In connection with the Superior Court Litigation, on October 13, 2023, Mohammad Honarkar (“Honarkar”), and 4G Wireless, Inc. (“4G,” together with the Debtors and Honarkar, the “Parties”), individually and derivatively on behalf of the MOM Investcos, filed an arbitration proceeding (the “Arbitration”) against Mahender Makhijani, Continuum Analytics, Inc., MOM AS Investor Group LLC, MOM BS Investor Group LLC, MOM BS Investor Group LLC, MOM AS Manager LLC, MOM BS Manger, LLC, MOM CA Manager LLC, and Nano Bank. The MOM Investcos were named as “nominal respondents” in the Arbitration. On February 21, 2025, a partial interim award was issued in the Arbitration (the “Arbitration Award”).

6. As of the Petition Date, approximately \$223,507.32 in rent owed to the respective Debtors is being held in the treasury of the Superior Court (collectively with rents further collected pursuant to the 527 Orders, the “Deposited Rents”).

7. The Parties agree that the Deposited Rents are property of the Debtors' estates. The Parties agree that, in light of these chapter 11 cases, the Superior Court Litigation, and the Arbitration Award, it is appropriate to disburse the Deposited Rents to the Debtors.

8. The Parties have agreed, subject to order of the Court, to resolve any disputes concerning the Deposited Rents on the terms set forth in the stipulation (the "Stipulation"), attached as Exhibit 1 to the proposed form of order attached hereto as Exhibit A (the "Proposed Order").

WHEREFORE, the Parties respectfully request that the Proposed Order attached hereto as Exhibit A approving the Stipulation, be entered at the earliest convenience of the Court.

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Dated: March 26, 2025
Wilmington, Delaware

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Proposed Counsel to the Debtors and Debtors in Possession